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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicant:	Chakrabarti et al.)	Art Unit:	2711
)		
Serial No.:	08/947,221)	Examiner:	Le
)		
Filed:	July 8, 1998)	AM9-97-120	
)		
For:	METHOD AND SYSTEM FOR FILTERING OF)	June 4, 2002	
	INFORMATION ENTITIES)	750 B STREET, Suite 3120	
)	San Diego, CA 92101	
)		

REPLY BRIEF

Commissioner of Patents and Trademarks
Washington, DC 20231

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Dear Sir:

This Reply Brief is in response to the Examiner's Supplemental Answer dated May 23, 2002. The entire argument for the prima facie case against Claim 1 is that URLs equal hyperlinks, as though that settles the issue. It doesn't. As Applicant has previously pointed out, Deerwester does not use references of any sort, hyperlinks, URLs, or otherwise, to derive affinity values, in contrast to Claim 1. Instead, Deerwester finds "relevance values" using term similarity, not document references such as hyperlinks. All the examiner can muster in response is a nearly incomprehensible and seemingly irrelevant question about whether Applicant thinks URLs reference one another regardless of relevance. How this enigmatic rhetorical question is meant to cure the weakness of an exceptionally suspect prima case is, to be charitable, somewhat opaque.

With respect to Claim 12, the Answer alleges that Applicant has committed the iniquity of arguing limitations not in the claim. Of this accusation, Applicant is innocent. All Applicant has done is point out

that "nowhere does Shoham teach using asymmetric values *such as* hyperlinks or other references between documents", much less using them to derive the claimed affinity values. Clearly, Applicant's use of "hyperlinks" in this argument is illustrative only, as indicated by being preceded by the phrase "such as". Applicant's thrust remains that Shoham's directed graph manifestly does not teach or suggest each and every element of Claim 12, given the deficiencies of Shoham explained in detail in the Supplemental Brief.

Respectfully submitted,



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